

October 22, 2019

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

**Re: USTelecom *Ex Parte* Notice, WC Docket Nos. 17-287, 11-42, 09-197**

Dear Ms. Dortch:

On October 18, 2019, the undersigned, along with Anisa Latif of AT&T, Jeb Benedict of CenturyLink, Ann Morrison of Consolidated, Alan Buzacott of Verizon, and Tim Loken of Windstream<sup>1</sup> met with Joseph Calascione, Legal Advisor to Commissioner Carr to discuss (1) the Lifeline item circulated on August 19, 2019;<sup>2</sup> (2) pending petitions regarding the Lifeline minimum service standards.<sup>3</sup> On October 21, 2019, this same group along with Terri Hoskins of AT&T, Chris Burke of Frontier, and Ben McDonald of Windstream but absent Mr. Buzacott and Mr. Loken met separately with Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel, and Alisa Valentin, Special Advisor to Commissioner Starks, to discuss the same two issues.<sup>4</sup>

The USTelecom representatives discussed press reports indicating that the item on circulation addresses the Lifeline Representative Accountability Database (RAD).<sup>5</sup> To the extent that those reports are correct, USTelecom reiterated its concerns about requiring individual employees of USTelecom's members to provide personally identifiable information (PII) to the RAD if they interact with the National Verifier (NV) database or the National Lifeline Accountability Database (NLAD) and/or are involved in Lifeline subscriber enrollment.<sup>6</sup> When considering mandatory procedures for the RAD, USTelecom encouraged the Commission to factor in the significant differences in the ability of USTelecom's members to hold their own

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<sup>1</sup> Ms. Morrison and Mr. Loken participated by teleconference.

<sup>2</sup> *FCC Items on Circulation*, <https://www.fcc.gov/items-on-circulation> (last visited Oct. 18, 2019).

<sup>3</sup> *Wireline Competition Bureau Seeks Comment on Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study*, Public Notice, DA 19-617 (WCB rel. July 1, 2019); *Wireline Competition Bureau Seeks Comment on NTCA Petition for Waiver*, DA 19-722, Public Notice (WCB rel. July 30, 2019).

<sup>4</sup> Ms. Latif, Ms. Morrison, Ms. Burke, and Mr. McDonald participated by teleconference.

<sup>5</sup> See, e.g., Monica Hogan, *FCC Circulates Proposed Order and FNPRM to Curb Lifeline Waste, Fraud and Abuse*, Comm. Daily, (Aug. 20, 2019); Monica Hogan, *Refocus Efforts on Stabilizing Lifeline, FCC Asked Amid Other Actions*, Comm. Daily, (Sept. 16, 2019).

<sup>6</sup> See Letter from Kristine Hackman, Vice President, USTelecom, to Marlene Dortch, Secretary, FCC (Sept. 25, 2019); see also Letter from Mike Saperstein, Vice President, USTelecom, to Marlene Dortch, Secretary, FCC (July 3, 2019).

Ms. Marlene Dortch  
October 22, 2019  
Page 2

employees accountable versus other Lifeline eligible telecommunications carriers (ETCs) that may be using sales agents.

The USTelecom representatives also discussed the petitions currently pending before the Commission that advocate delaying implementation of more robust minimum service standards, or grandfathering the current minimum service standards. USTelecom members are actively working to prepare for the minimum service standard changes set for December 1, 2019. To the extent the Commission is considering postponing the implementation date, USTelecom emphasized the importance of knowing this information as soon as possible to prevent customer confusion and avoid undoing work that carriers have already undertaken to prepare for the December 1, 2019 deadline.

USTelecom continues to support the Commission's efforts to end waste, fraud, and abuse in the Universal Service Fund program, including Lifeline.

Please contact me with any questions.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_

Kristine Hackman  
Vice President, Policy & Advocacy

cc: Joseph Calascione  
Travis Litman  
Alisa Valentin